



000111025

## ER/WM&amp;I DDT

CORRES CONTROL

LTR. NO

K H Corres #

Originator Ltr Log #

AMT-033-97

97 RF

DIST	CM	ENC
BARTHEL J.M.		
BENSEL P.R.		
BENSON C.A.		
CARMEAN C.H.		
DAWSON D.		
EDWARDS J.D.		
FINDLEY M.E.		
FITZ R.C.		
GUINN L.A.		
HUGHES F.P.		
MCNALLY J.L.		
POWER A.P.		
REED A.B.		
TYSON A.M.		
WAGNER M.J.		
WHEELER M.		

M.C. Broussard X  
 J.P. Schmuck X  
 G.D. DiGregorio X

Source/Driver (Name & Number from  
ISP, IAG milestone Mgmt Action, Corres  
Control etc)

Closure # (Outgoing Correspondence  
Control #, if applicable)

March 31, 1997

Due Date

J.P. Schmuck

Originator Name

G.D. DiGregorio

QA Approval

A. M. Tyson

Contractor Manager(s)

Ann K. Sieben

Kaiser-Hill Program Manager(s)

Document Subject

PATS COMMITMENT NO 95-001131 FOR EXTENSION - AMT-033-97

KH-00003NS1A

## Discussion and/or Comments.

Efforts continue to develop a regulatory and risk-based framework to modify the FO 29 procedure. In December 1996 the draft IGD was revised to use RFCA Action Level Framework values in the FO 29 procedure. Recently CDPHE has changed it's position and is once again adamant that the Colorado Conservative Screen at 10-6 risk levels is the only option allowing return of RCRA-listed hazardous IDM to it's point of origin. Currently, based upon Tim Rehder's suggestion, RMRS is developing a proposal that would first ID the waste as RCRA-listed or not RCRA-listed. The Colorado Conservative Screen would then be applied to the RCRA-listed IDM and the ALF would be applied to the IDM that is not RCRA-listed.

Hopefully the proposal can be developed and finalized in conjunction with finalizing the IGD. For that reason we request a three month extension of the PATs commitment to June 30 1997 so that the IGD may be finalized and any necessary modifications to FO 29 can be performed.

CC  
 M C Broussard  
 J P Schmuck  
 A. M. Tyson  
 ER Records (2)

RMRS RECORDS (2) X X  
 RF CORRES CONTROL X X  
 TRAFFIC  
 PATS/130G

## CLASSIFICATION

UCN  
 UNCLASSIFIED  
 CONFIDENTIAL  
 SECRET

AUTHORIZED CLASSIFIER  
 SIGNATURE

Date 3-25-97

IN REPLY TO RF CC NO

00811RF95

ACTION ITEM STATUS

☐ PARTIAL/OPEN☐ CLOSED

LTR APPROVALS

ORIG &amp; TYPIST INITIALS

RF-4

R/WM &amp; I DDT 7/95

ADMIN RECCRD

SW-A-004130

1/2

CONTROL  
OUTGOING LTR NO

DOE ORDER #

97-RF-1642

DIST	LTR	ENC
BUSSON STAN		
SFORD MARV		
UHL TONY		
URDGE LARRY		
WARDING WYNN		
ARD BOB		
ILL JOHN		
IARTINEZ LEN		
GG BOB		
ARKER ALAN		
LLER ROBERT		
JOR NANCY		
DORHEIS GARY		

March 26, 1997

97-RF-01642

Norma Castaneda  
ES&H Program Assessment  
DOE, RFFO

PATS COMMITMENT FOR 95-001131 EXTENSION - AKS-010-97

Efforts continue to develop a regulatory and risk-based framework to modify the FO 29 procedure. In December 1996 the draft Implementation Guidance Document (IGD) was revised to use RFCA Action Level Framework (ALF) values in the FO 29 procedure. Recently, CDPHE has changed its position and is once again adamant that the Colorado Conservative Screen at  $10^{-6}$  risk levels is the only option allowing return of RCRA-listed hazardous Investigation-Derived Material (IDM) to its point of origin. Currently, based upon Tim Rehder's suggestion, RMRS is developing a proposal that would first ID the waste as RCRA-listed or not RCRA-listed. The Colorado Conservative Screen would then be applied to the RCRA-listed IDM and the ALF would be applied to the IDM that is not RCRA-listed.

Hopefully the proposal can be developed and finalized in conjunction with finalizing the IGD. For that reason, we request a three month extension of the PATs commitment so that the IGD may be finalized and any necessary modifications to FO 29 can be performed.

A. K. Sieben  
Waste & Remediation Operations

bag

Orig and 1 cc - N Castaneda

RES CONTROL X X  
IIN RECRD/080  
S/T130G

CLASSIFICATION

CLASSIFIED  
CONFIDENTIAL  
SECRET

HORIZONTAL CLASSIFIER

SIGNATURE

npt per CEX-266-95

REPLY TO RFP CC NO

1  
ACTION ITEM STATUS

PARTIAL/OPEN

CLOSED

LTR APPROVALS

IG & TYPIST INITIALS

AKS bag

99 (Rev 3/97)

Kaiser-Hill Company, L L C

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